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MUR # 6378

SENSITIVE

VIA FACSIMILE
AND U.S. MAIL

September 10, 2010

Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: **Political Advertising Disclaimer**

Dear Commissioners:

On behalf of the Giffords for Congress campaign committee, we file this complaint alleging violations of the Federal Election Campaign Laws by the Conservatives for Congress Committee ("CCC"), a self-described "group of business and community leaders who are committed to A) Exposing liberal politicians who masquerade as moderates and B) electing genuine conservatives in their place." <http://conservativesforcongresscommittee.org/>

Respondents have violated the Federal Election Campaign Act of 1971, as amended ("FECA") and the Federal Election Commission ("FEC") regulations implementing that Act, by failing to include source disclaimers on at least three public communication as defined under 11 C.F.R. § 100.26.

The Facts

Upon information and belief, the CCC is responsible for three billboard advertisements, located along the I-10 near exit 236 in Marana, Arizona; on Highway 80 just west of Tombstone, Arizona; and at 22nd Street and Freeway in Tucson, Arizona. Each advertisement depicts Gabrielle Giffords as a puppet being controlled by House Speaker Nancy Pelosi. The text appearing on the billboards states, "PELOSI'S PUPPET? GABBY'S GOTTA GO!" See photograph enclosed at Tab 1. Contrary to Federal

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Election law, the billboards contain no disclosure of the person or committee paying for the advertisement.

The CCC website contains text and images that are strikingly similar to the three billboards. On the CCC website's homepage, there is a section titled "Gabby's gotta go." See <http://conservativesforcongresscommittee.org/Default.aspx>, *enclosure at Tab 2*. Further, the website's "videos" subdomain contains a video entitled "Gabby Giffords is Pelosi's Puppet." See <http://conservativesforcongresscommittee.org/Videos.aspx>. See also screenshots from the "Pelosi's Puppet" video enclosed at Tab 3.

Violation of the Law

The billboards constitute a "public communication" that "expressly advocate[s] the election or defeat of a clearly identified candidate." 11 C.F.R. §§ 100.26; 110.11(a)(2). As such, they must contain a disclaimer that provides the reader or observer with clear and conspicuous notice "of the identity of the person or political committee that paid for, and where required, authorized the communication." 11 C.F.R. § 110.11(c). As evident from the photograph enclosed at Tab 1, the billboards do not contain the required disclaimer.

Conclusion

This political advertising violates Federal Election law and regulations. Because this improper advertising is potentially viewed by thousands of individuals each day, we request that the Federal Election Commission conduct an immediate investigation into this matter, and subject the responsible party to the highest penalties provided under this statute.

Very truly yours,

Christine Hammerle

Christine Hammerle

Counsel to the Giffords for Congress campaign committee

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STATE OF Arizona)

County of Maricopa)

SUBSCRIBED AND SWORN to before me this 10th day of September, 2010.

Tanya M. Blume
Notary Public

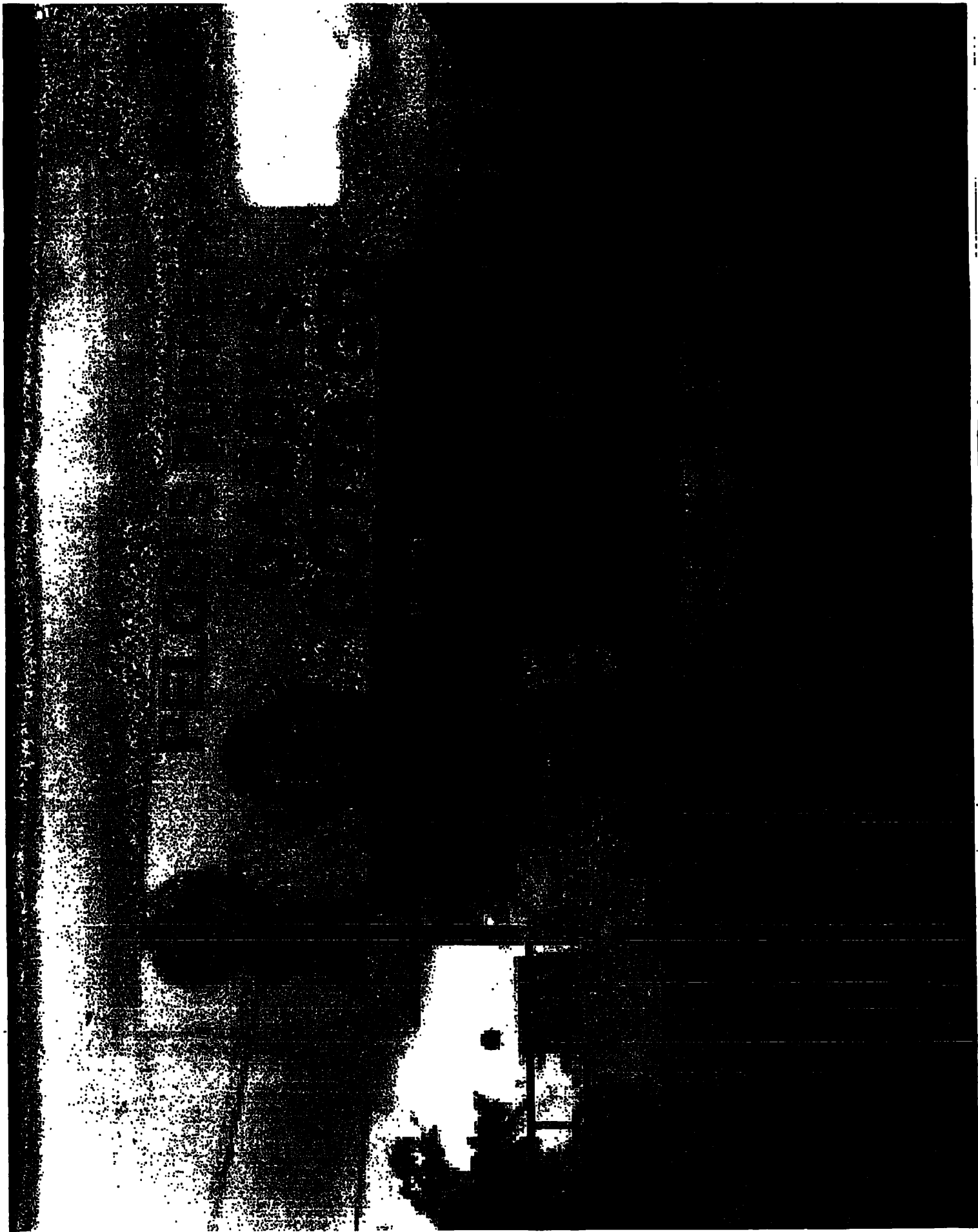
My Commission Expires:

March 1, 2012



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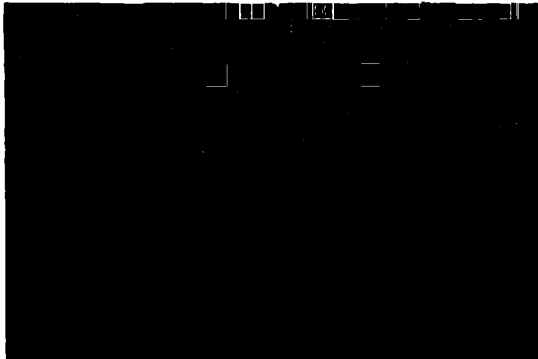
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UPDATE: There she goes again, Giffords wants us to remove our latest ad

UPDATE: Watch Giffords ask questions about the war

Time for real hope and change



Conservatives for Congress is a committee of independent Southern Arizona business and community leaders who believe that many of our current representatives in Washington do not represent the concerns of the majority of their constituents. This includes protecting our borders, being fiscally responsible, supporting our armed forces, making us energy independent, insisting on government accountability and improving our

entire educational system.

To that end, we will work to defeat those who do not support a strong conservative platform. This includes both incumbents and candidates for office...and may include members of any political party.

By the same token, we welcome the support of all those – no matter what party they may belong to – who share our beliefs.

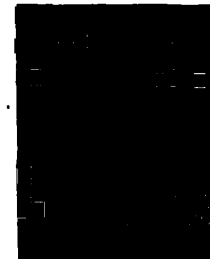
In the news



Making health care easier, government style >>



Giffords thinks the stimulus worked, did it? >>



"Our Own Government Has Become Our Enemy" >>

Gabby's gotta go



Gabby Giffords has consistently voted for policies and laws that are endangering the American standard of living. Endorsed by Obama and Nancy Pelosi, Giffords simply must be voted out of office. Arizona must not bow!

"Republicans hate Latinos"



Department of Labor representative Dolores Huerta's speech praising Venezuelan dictator Hugo Chavez and saying "Republicans hate Latinos," reveals that Huerta's appearance was supported by Congressman

Raul M. Grijalva [Read the story](#)

Paid for by Conservatives for Congress Committee and not authorized by any candidate or candidate's committee.
Contact us at Conservatives for Congress Committee, 8140 N. Thornydale #452, Tucson, AZ 85741

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